

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 15 Case
)	
Fairfield Sentry Limited, et al.,)	Case No. 10-13164 (BRL)
)	
Debtors in Foreign Proceedings.)	Jointly Administered
)	
Fairfield Sentry Limited (In Official Liquidation), Fairfield Sigma Limited (In Official Liquidation), and Fairfield Lambda Limited (In Official Liquidation) acting by and through The Foreign Representatives thereof)	Adv. Pro. No. 10-03757 (BRL))
Plaintiffs,)	
)	
-against-)	
)	
SNS Global Custody and Beneficial Owners of Accounts Held in the Name of SNS Global Custody 1-1000,)	
Defendants.)	
)	
Fairfield Sentry Limited (In Official Liquidation), acting by and through The Foreign Representatives thereof,)	Chapter 15 Case
)	
Plaintiffs,)	Case. No. 10-13164 (BRL)
)	
-against-)	Jointly Administered
)	
AXA Isle of Man A/C L&C and Beneficial Owners of the Accounts Held in the Name of AXA Isle of Man A/C L&C 1-1000,)	
)	
Defendants.)	Adv. Pro. No. 10-03623 (BRL)
)	
Fairfield Sentry Limited (In Liquidation), Fairfield Sigma Limited (In Liquidation),)	
)	
Plaintiffs,)	
)	
-against-)	
)	
Blubank Ltd., et al.,)	
Defendants.)	Adv. Pro. No. 10-03750 (BRL)

**Fairfield Sentry Limited (In Liquidation), Fairfield
Sigma Limited (In Liquidation),
Plaintiffs,

-against-

Nomura International plc, et al.,

Defendants.**

Adv. Pro. No. 10-03793 (BRL)

**Fairfield Sentry Limited (In Liquidation), Fairfield
Sigma Limited (In Liquidation),
Plaintiffs,

-against-

Banco Itau Europa Luxembourg SA, et al.,

Defendants.**

Adv. Pro. No. 10-03755 (BRL)

Fairfield Sentry Limited,

Plaintiff,

-against-

Zurich Capital Markets Company, et al.,

Defendants.

Adv. Pro. No. 10-03634 (BRL)

Fairfield Sentry Limited (In Liquidation),

Plaintiff,

-against-

ABN AMRO Schweiz AG, et al.,

Defendants.

Adv. Pro. No. 10-03635 (BRL)

**Fairfield Sentry Limited (In Liquidation), Fairfield
Sigma Limited (In Liquidation) and Fairfield
Lambda Limited (In Liquidation),

Plaintiff.**

-against-)	
ABN AMRO Schweiz AG, et al.,)	
Defendants.)	
Fairfield Sentry Limited (In Liquidation),)	Adv. Pro. No. 10-03636 (BRL)
Plaintiff,)	
-against-)	
Banco Bilbao Vizcaya Argentaria, S.A. (BBVA Miami),)	
Defendants.)	Adv. Pro. No. 10-03515 (BRL)

Fairfield Sentry Limited (In Liquidation),)	
Plaintiff,)	
-against-)	
FS/BBVA Miami,)	
Defendant.)	Adv. Pro. No. 10-03618 (BRL)
Fairfield Sentry Limited (In Official Liquidation),)	
acting by and through the Foreign Representatives thereof,)	
Plaintiffs,)	
-against-)	
HSBC Private Bank (Suisse) SA and Beneficial Owners of the Accounts Held in the Name of HSBC Private Bank (Suisse) SA 1-1000,)	
Defendants.)	Adv. Pro. No. 10-03633 (BRL)
Fairfield Sentry Limited (In Official Liquidation),)	
acting by and through the Foreign Representatives thereof,)	

Plaintiffs,
-against-
**FS/HSBC Private Banking Nom and Beneficial
Owners of the Accounts Held in the Name of
FS/HSBC Private Banking Nom 1-1000,**
Defendants.

Adv. Pro. No. 10-03629 (BRL)

**Fairfield Sentry Limited (In Official Liquidation),
acting by and through the Foreign Representatives
thereof,**
Plaintiffs,
-against-
**HSBC Institutional Trust Services (Asia) Limited and
Beneficial Owners of the Accounts Held in the Name
of HSBC Institutional Trust Services (Asia) Limited
1-1000,**
Defendants.

Adv. Pro. No. 10-03619 (BRL)

**Fairfield Sentry Limited, et al. (In Official
Liquidation), acting by and through the Foreign
Representatives thereof,**
Plaintiffs,
-against-
**Robinson & Co. and Beneficial Owners of the
Accounts Held in the Name of Robinson & Co. 1-
1000,**
Defendants.

Adv. Pro. No. 10-03628 (BRL)

**Fairfield Sentry Limited, et al. (In Official
Liquidation), acting by and through the Foreign
Representatives thereof,**

Plaintiffs,)	
)	
-against-)	
)	
HSBC Private Bank (Guernsey) LTD and Beneficial)	
Owners of the Accounts Held in the Name of HSBC)	
Private Bank (Guernsey) LTD 1-1000,)	
)	
Defendants.)	
)	
)	Adv. Pro. No. 10-03631 (BRL)
Fairfield Sentry Limited, et al. (In Official)	
Liquidation), acting by and through the Foreign)	
Representatives thereof,)	
)	
Plaintiffs,)	
)	
-against-)	
)	
Caceis Bank Luxembourg and Beneficial Owners of)	
the Accounts Held in the Name of Caceis Bank)	
Luxembourg 1-1000,)	
)	
Defendants.)	
)	
)	Adv. Pro. No. 10-03624 (BRL)
Fairfield Sentry Limited (In Official Liquidation),)	
acting by and through the Foreign Representatives)	
thereof,)	
)	
Plaintiffs,)	
)	
-against-)	
)	
CDC IXIS and Beneficial Owners of the Accounts)	
Held in the Name of CDC IXIS 1-1000,)	
)	
Defendants.)	
)	
)	Adv. Pro. No. 10-03754 (BRL)
Fairfield Sentry Limited (In Official Liquidation),)	
acting by and through the Foreign Representatives)	
thereof,)	
)	
Plaintiffs,)	

<div>-against-</div> <div>Caceis Bank EX-IXIS IS and Beneficial Owners of the Accounts Held in the Name of Caceis Bank EX-IXIS IS 1-1000,</div> <div>Defendants.</div>))
--	---

)	
-against-)	
Zurich Capital Markets Company and Beneficial Owners of the Accounts Held in the Name of Zurich Capital Markets Company 1-1000 et al.,)	
Defendants.)	
Fairfield Sentry Limited, et al. (In Official Liquidation), acting by and through the Foreign Representatives thereof,)	Adv. Pro. No. 10-03634 (BRL)
Plaintiffs,)	
-against-)	
BNP Paribas Securities Services Luxembourg and Beneficial Owners of the Accounts Held in the Name of BNP Paribas Securities Services Luxembourg 1-1000,)	
Defendants.)	
Fairfield Sentry Limited (In Official Liquidation), acting by and through the Foreign Representatives thereof,)	Adv. Pro. No. 10-03627 (BRL)
Plaintiffs,)	
-against-)	
BNP Paribas Luxembourg SA and Beneficial Owners of the Accounts Held in the Name of BNP Paribas Luxembourg SA 1-1000,)	
Defendants.)	
Fairfield Sentry Limited,)	Adv. Pro. No. 10-03626 (BRL)
Plaintiff,)	
-against-)	

State Street Bank Luxembourg SA, et al.,)
)
Defendants.)
)

Adv. Pro. No. 10-03760 (BRL)

STIPULATION AND ORDER ON RESPONSE TO COMPLAINT

WHEREAS, on various dates between August 17 and October 5, 2010, plaintiffs Fairfield Sentry Limited, Fairfield Sigma Limited, and Fairfield Lambda Limited, acting by and through the foreign representatives thereof (collectively the “Plaintiffs”), filed Complaints in the above-captioned actions (the “Complaints”); and

WHEREAS, on various dates between August 17 and October 7 the Court issued Summonses in the above-captioned action (the “Summonses”); and

WHEREAS, the Summonses state that responses to the Complaints are due on dates thirty (30) days following the dates of the Summonses, which dates fall between September 16 and November 8, 2010 (the “Summons Response Dates”); and

WHEREAS, the Plaintiffs have filed a motion seeking, among other things, the entry of an order setting a schedule for the above-referenced actions and certain other actions commenced by the Plaintiffs [Docket No. 115 in Chapter 15 Case No. 10-13164 (BRL)] (the “Scheduling Motion”); and

WHEREAS, the Scheduling Motion is currently scheduled for hearing on November 9, 2010, at 10 a.m. (the “Pending Hearing Date”), a date that is after the Summons Response Dates;

NOW THEREFORE, in order to extend the Summons Response Dates past the Pending Hearing Date and any further continuance or modification thereof, the Plaintiffs and the undersigned defendants hereby stipulate and agree as follows:

1. Notwithstanding and superseding the Summons Response Dates, the deadlines for the undersigned Defendants to respond to the Complaints are adjourned until January 15, 2011, without prejudice and subject to (a) the positions of Plaintiffs and each of the undersigned Defendants with respect to Plaintiffs' proposed scheduling order; and (b) Plaintiffs' and each of the undersigned Defendants' reservation of rights, in connection with the hearing on the Scheduling Motion or otherwise, to seek further extensions of time for each of the undersigned Defendants to respond to the Complaints; and (c) any order of a court of competent jurisdiction establishing a different schedule, upon request by one of the Parties or otherwise.

2. Plaintiffs and the undersigned defendants otherwise reserve all of their respective rights, claims, and defenses, including without limitation any defenses that the undersigned defendants may have as to adequacy of service, subject matter jurisdiction, and personal jurisdiction.

Dated: New York, New York
November 1, 2010

BROWN RUDNICK LLP

By: /s Kerry L. Quinn
David J. Molton
Kerry L. Quinn
Seven Times Square
New York, New York 10036
Telephone: (212) 209-4800

Counsel for Plaintiffs Fairfield Sentry Limited (In Official Liquidation), Fairfield Sigma Limited (In Official Liquidation), and Fairfield Lambda Limited (In Official Liquidation), by and through their Foreign Representatives

REED SMITH LLP

By: /s Lance Gotthoffer
James C. McCarroll
Lance Gotthoffer

599 Lexington Avenue
New York, New York 10022
Telephone: (212) 521-5400

Counsel for Defendant Teorema Alternative Strategies

WILMER CUTLER PICKERING HALE AND
DORR LLP

By: /s Charles C. Platt
Charles Platt
Andrea J. Robinson
George W. Shuster, Jr.
399 Park Avenue
New York, NY 10022
Telephone: (212) 230-8800

Counsel for Defendant SNS Global Custody B.V.

WILMER CUTLER PICKERING HALE AND
DORR LLP

By: /s Charles C. Platt
Charles C. Platt
Wilmer Cutler Pickering Hale and Dorr LLP
399 Park Avenue
New York, NY 10022
Tel. (212) 230-8800
Fax (212) 230-8888

Jeffrey B. Rudman
Wilmer Cutler Pickering Hale and Dorr LLP
60 State Street
Boston, MA 02109
Tel. (617) 526-6000
Fax (617) 526-5000

Counsel for State Street Bank Luxembourg SA

SHEARMAN & STERLING LLP

By: /s Tammy P. Bieber
Tammy P. Bieber

599 Lexington Avenue
New York, New York 10022-6069
(212) 848-4000

*Counsel for Defendant Blubank Ltd., now
known as Inteligo Bank Ltd.*

SHEARMAN & STERLING LLP

By /s Brian H. Polovoy
Brian H. Polovoy

599 Lexington Avenue
New York, New York 10022
(212) 848-4000

*Counsel for Defendant Nomura
International plc*

MILBANK, TWEED, HADLEY & McCLOY
LLP

By: /s James G. Cavoli
James G. Cavoli
Sean M. Murphy
1 Chase Manhattan Plaza
New York, NY 10005
Telephone: (212) 530-5000

Counsel for AXA Isle of Man Limited

CLEARY GOTTlieb STEEN & HAMILTON LL

One Liberty Plaza
New York, New York 10006
Telephone: (212) 225-2000

By: /s Evan A. Davis
Evan A. Davis

*Attorneys for Defendants HSBC Private Bank
(Suisse) SA, HSBC Securities Services
(Luxembourg) SA, HSBC Bank USA NA (sued
here as HSBC Bank USA), HSBC Private Bank
(C.I.) Limited (sued here as HSBC Private Bank
(Guernsey) Ltd), HSBC Private Banking Nominee
1 (Jersey) Limited (sued here as FS/HSBC
Private Banking Nom), HSBC Institutional Trust
Services (Asia) Limited and Robinson & Co.*

SHEARMAN & STERLING LLP

By: /s James L. Garrity
James L. Garrity, Jr.

599 Lexington Avenue
New York, New York 10022
(212) 848-4000

Heather Lamberg Kafele
Keith Palfin
801 Pennsylvania Avenue, NW
Suite 900
Washington, DC 20004-2634
(202) 508-8000

*Counsel for Defendants Banco Itaú Europa
Luxembourg SA, BBVA (Suisse) SA, Banco
Bilbao Vizcaya Argentaria, S.A. (BBVA
Miami), and FS/BBVA Miami*

By: /s Lawrence B. Friedman
Lawrence B. Friedman

*Attorneys for Caceis Bank Luxembourg, CDC
IXIS and Caceis Bank EX-IXIS IS*

By: /s Carmine D. Boccuzzi, Jr.
Carmine D. Boccuzzi, Jr.

*Attorneys for Citibank NA London, Citibank
(Switzerland) AG, Citigroup and Citivic
Nominees Limited*

By: /s Breon S. Peace
Breon S. Peace

*Attorneys for BNP Paribas Securities Services
Luxembourg, BGL BNP Paribas (sued here as
BNP Paribas Luxembourg SA), BNP Paribas
(Suisse) SA, BNP Paribas (Suisse) SA Ex Fortis,
and BNP Paribas (Suisse) SA Private*

IT IS SO ORDERED by this Court, 2nd day of November, 2010.

/s/Burton R. Lifland
United States Bankruptcy Judge